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11/15/2006

November 15, 2006

Ms. Jan Palumbo, RCRA Project Manager
United States EPA, Region 10
1200 Sixth Avenue, Mail Stop WCM-121
Seattle, WA 98101

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Office of Air, Waste & Toxics

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Subject: **November 15, 2006, Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the November 15, 2006, progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from October 15, 2006, to November 15, 2006.

Significant Developments This Period

This section discusses significant developments for the referenced reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- Baxter continued the Nonaqueous Phase Liquid (NAPL) Study in accordance with the Nonaqueous Phase Liquid Investigation Work Plan.
- On November 1, 2006, Baxter conducted water level measuring in accordance with the Revised Supplemental Dissolved-Phase Groundwater Monitoring Plan.
- During the week of November 6, 2006, Baxter conducted groundwater sampling in accordance with the Revised Supplemental Dissolved-Phase Groundwater Monitoring Plan and closed woodwaste landfill monitoring requirements.

Anticipated Developments Next Period

This section discusses developments anticipated during the next reporting period, as outlined below:



- Baxter will continue collecting NAPL and groundwater data.

Anticipated Problems and Problem Resolution

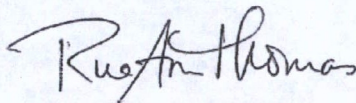
This section discusses anticipated problems, and planned resolution of past or anticipated problems.

- No new problems or issues have been identified at the facility.

Certification

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

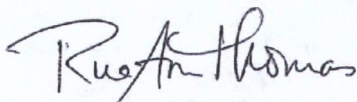
Signature:



Name: RueAnn Thomas
Title: Environmental Programs Director
Date: November 15, 2006

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (541) 689-3801.

Sincerely,



RueAnn Thomas
Environmental Programs Director

cc: Jeanne Tran, Ecology
Georgia Baxter, J. H. Baxter & Co.
Mary Larson, J. H. Baxter & Co.
J. Stephen Barnett, Premier Environmental Services, Inc.